

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UBER TECHNOLOGIES, INC., *et al.*,
Defendants.

**DECLARATION OF MILES EHRlich
IN SUPPORT OF PLAINTIFF
WAYMO'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL ITS
OPPOSITION TO DEFENDANTS
UBER TECHNOLOGIES, INC. AND
OTTOMOTTO, LLC'S MOTION TO
EXCLUDE ONE OF THREE OPINIONS
PROFFERED BY WAYMO EXPERT
JIM TIMMINS (Dkt. 1773)**

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am a partner at the law firm Ramsey & Ehrlich LLP, counsel for Non-Party Anthony Levandowski. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal Its Opposition To Defendants Uber Technologies, Inc. And Ottomotto, LLC’s Motion To Exclude One Of Three Opinions Proffered By Waymo Expert Jim Timmins (Dkt.

1773) (“The Administrative Motion”). The Administrative Motion seeks an order sealing the following documents based on Mr. Levandowski’s designation of privilege and/or confidentiality:

Document	Portion to Be Filed Under Seal	Designating Party
Waymo’s Opposition To Defendants Uber Technologies, Inc. And Ottomotto, LLC’s Motion To Exclude One Of Three Opinions Proffered By Waymo Expert Jim Timmins (“Waymo’s Brief”)	Highlighted Portions	Anthony Levandowski (yellow highlights)
Exhibit 4 to Waymo’s Brief	Entire Document	Anthony Levandowski
Exhibit 9 to Waymo’s Brief	Highlighted Portions	Anthony Levandowski (yellow highlighted portions)

3. The yellow-highlighted portions of Waymo’s Brief reflect confidential information regarding Mr. Levandowski’s estate planning for his family, including his minor children, through the creation of a trust of which they are the beneficiaries. The confidential information includes detailed information about Mr. Levandowski’s personal ownership interests in certain non-party, private entities Sandstone Group, the financing of Sandstone Group, the ownership of Tyto LiDAR, and the financing of Tyto LiDAR. Mr. Levandowski requests that his confidentiality interests in this personal estate and finance information be respected in this proceeding.

4. Exhibit 4 is the document through which Mr. Levandowski created a trust for the benefit of his minor children. Because this document reflects sensitive, personal, estate planning information, Mr. Levandowski requests that the confidentiality of this document be maintained.

5. Exhibit 9 is an excerpt of the deposition of Mr. Levandowski, the yellow highlighted portions of which reflect the same confidential estate planning and personal financial information discussed in paragraphs 3 and 4 above. Mr. Levandowski therefore requests that this

1 information remain confidential.

2 6. Waymo's request to seal is narrowly tailored to those portions of Waymo's
3 Opposition To Defendants Uber Technologies, Inc. And Ottomotto, LLC's Motion To Exclude
4 One Of Three Opinions Proffered By Waymo Expert Jim Timmins that merit sealing.
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6 I declare under penalty of perjury under the laws of the State of California and the United
7 States of America that the foregoing is true and correct, and that this declaration was executed in
8 Berkeley, California, on September 26, 2017.
9

10 Date: September 26, 2017

Respectfully submitted,

11 /s/ Miles Ehrlich

12 Miles Ehrlich

13 Ramsey & Ehrlich LLP

14 *Counsel for Non-Party Anthony*
15 *Levandowski*
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